

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

MICHAEL COREY JENKINS, et al.

PLAINTIFFS

v.

CAUSE NO. 3:23-cv-374-DPJ-ASH

RANKIN COUNTY, MISSISSIPPI, et al.

DEFENDANTS

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UNOPPOSED MOTION FOR LEAVE  
TO DEPOSE AN INCARCERATED PERSON – ALAN SCHMIDT

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NOW COMES Defendant, Sheriff Bryan Bailey, by and through counsel, and moves this Court for leave to depose Alan Schmidt, an incarcerated person, by stating as follows:

- 1) Defendant Bailey desires to depose Alan Schmidt, an individual identified as one of Plaintiffs' potential witnesses and who is represented by Plaintiffs' counsel.
- 2) Because Schmidt is currently incarcerated in the Rankin County Adult Detention Center, Defendant Bailey must obtain leave of this Court to take the deposition. *See* Fed. R. Civ. P. 30(a)(2)(B).
- 3) Pursuant to L.U. Civ. R. 7(b)(10), the undersigned counsel has spoken with Plaintiffs' counsel this afternoon about this motion and has been advised that there will be no opposition to same.
- 4) Due to the simple and self-explanatory nature of this motion, Defendant respectfully requests to be relieved from any obligation to file an accompanying memorandum of authorities.

WHEREFORE, PREMISES CONSIDERED, Defendant, Sheriff Bryan Bailey, prays that this Court grant him leave to depose Alan Schmidt, an incarcerated person.

RESPECTFULLY SUBMITTED, this 7<sup>th</sup> day of February, 2025.

SHERIFF BRYAN BAILEY - DEFENDANT

BY: */s/ Jason E. Dare*  
JASON E. DARE

OF COUNSEL:

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